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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

DALI WIRELESS, INC.,

Plaintiff,

v.

CORNING OPTICAL COMMUNICATIONS  
LLC,

Defendant.

Case No: 3:20-cv-06469-EMC

**DALI WIRELESS, INC.'S  
ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
SEALED**

Pursuant to Civil Local Rules 7-11(a) and 79-5(f), Plaintiff Dali Wireless, Inc. (“Dali”) respectfully submits this Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed in connection with Dali’s Opposition to Defendant Corning Optical Communications, LLC’s (“Corning”) Notice of Combined Motion to Strike and Motion to Dismiss Dali’s Willful Infringement Allegations (“Dali’s Opposition”).

Certain portions of Dali’s Opposition contain information that Corning has designated CONFIDENTIAL or CONFIDENTIAL ATTORNEY EYES ONLY pursuant to the parties’ Stipulated Protective Order (“Protective Order”) entered by this Court on November 10, 2021, ECF No. 63.

Accordingly, Dali seeks to file under seal the documents and information as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Dali’s Opposition	Highlighted in yellow	Corning

Materials and documents may be provisionally filed under seal pursuant to Civil Local Rule 79-5(f) when the document, or portions thereof, “has been designated as confidential by another party or non-party.” L.R. 79-5(f). Dali has made a good faith effort to identify with yellow highlighting what it believes remains Corning’s CONFIDENTIAL and/or CONFIDENTIAL ATTORNEY EYES ONLY information in light of public disclosures by Corning and this Court of certain previously sealed details. Nonetheless, out of an abundance of caution, Dali has filed its entire Opposition under seal to give Corning an opportunity to review Dali’s Opposition and, if necessary, identify any additional portions of the Opposition that Corning contends contains its protectable confidential information. If Corning believes additional portions of Dali’s Opposition contain its CONFIDENTIAL and/or CONFIDENTIAL ATTORNEY EYES ONLY information, Corning can so identify it for the Court and justify its sealing. At this point, Dali takes no position on the merits of sealing Corning’s designated material (including the highlighted portions) and expects Corning to file one or more declarations in accordance with Local Rule 79-5(f)(3). Further, Dali is amenable to filing a public, more narrowly redacted Opposition when Corning has had an opportunity to review and confer with Dali on the matter.

1 In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the above  
 2 listed documents accompany this Administrative Motion. In accordance with Local Rule 79-5(c)(3), Dali  
 3 has also filed a Proposed Order herewith.

4 Dated: July 1, 2022

/s/ Stefan Szpajda

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